

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

MICHELLE ANDERSON, an individual,
On Behalf of Herself and All Others
Similarly Situated,

Plaintiff,

v.

TRAVELEX INSURANCE SERVICES
INC. and TRANSAMERICA CASUALTY
INSURANCE COMPANY,

Defendants.

Case No. 8:18-cv-00362-JMG-SMB

**PLAINTIFF’S MOTION FOR
APPROVAL OF ATTORNEYS’ FEES,
EXPENSES AND SERVICE AWARD**

Pursuant to FED. R. CIV. P. 23(h), Plaintiff Michelle Anderson (“Plaintiff”) respectfully moves this Court for entry of an Order:

- (1) awarding Plaintiff’s Counsel¹ attorneys’ fees of \$1,079,166.67;
- (2) awarding Plaintiff’s Counsel up to \$75,000.00 in reimbursement of their Litigation Expenses incurred and disbursed in prosecuting this litigation;²
- (3) awarding a service award of \$6,500.00 to Plaintiff for her service in representing the Settlement Class; and
- (4) approving payment of up to \$199,500 to the Settlement Administrator for its actual fees and costs incurred, in providing notice and settlement administration services.

¹ Capitalized terms not otherwise defined have the meaning set forth in the Parties’ Class Action Settlement Agreement dated June 11, 2021 (the “Settlement Agreement” or “Settlement”) filed previously with the Court. *See* Dkt. 108-2.

² Plaintiff will provide the Court with an update as to Plaintiff’s Counsel’s actual Litigation Expenses at or prior to the Final Approval Hearing, which will in any event be below the maximum \$75,000 amount set forth in the Notice to the Settlement Class.

In support of this Motion, Plaintiff relies upon the accompanying Memorandum of Law and the Declaration of Peter R. Kahana, which attaches, among other things, the Declarations of Ingrid Evans, Randall Andreozzio, Brian Devery, and Michelle Anderson, as well as all other documents filed in support of the Settlement, and all other proceedings in this Action. Pursuant to the terms of the Settlement Agreement, Defendants do not oppose the relief requested. Dkt. 108-2 at ¶ C.8.

A proposed form of Order will be emailed to the Court in accord with Local Rule 7.2. Concurrent with the filing of this Motion, Plaintiff is also filing a separate Motion for Final Approval of Class Action Settlement, in advance of the Final Approval Hearing scheduled for September 22, 2021.

Dated: September 1, 2021

Respectfully submitted,

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*Counsel for Plaintiff and the Proposed Settlement
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CERTIFICATE OF SERVICE

I certify that on September 1, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on the following counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF:

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